

Exhibit Q

LAW OFFICES
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June 20, 2024

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VIA E-MAIL (nlaraway@carvercompanies.com) and REGULAR MAIL

Mr. Nick Laraway
Chief Operating Officer
Carver Companies
2170 River Road
Coeymans, NY 12045

Re: Notice of Claim for Damage
To the Owners and Operators of TUG MACKENZIE ROSE
Allision of M/T MACKENZIE ROSE with Main Line Bridge of Norfolk and
Portsmouth Belt Line Railroad Company
Date of Allision: June 15, 2024
Preservation of Evidence Demand

Dear Mr. Laraway:

This law firm represents Norfolk and Portsmouth Belt Line Railroad Company (“Belt Line”). I write regarding damage caused by Tug Mackenzie Rose alliding with the Belt Line’s main line bridge on Saturday June 15, 2024. The bridge spans the Southern Branch of the Elizabeth River from 36.81096 North Latitude/76.229215 West Longitude to 36.81234 North Latitude/76.28872 West Longitude.

AIS voyage data and video document the Tug pushing a deck barge northbound in the Southern Branch of the Elizabeth River when it struck the main line bridge, knocking it from its pier structure and causing substantial damage, as shown in the enclosed photograph.

The bridge remains out of service and the Belt Line is incurring continuing economic damage resulting from loss of use.

Carver Companies, or one of its operating entities owns and/or operates Tug Mackenzie Rose. The Belt Line demands adequate security for all damage caused by the Tug. Failing that, we will seek to have the vessel arrested as security for the loss. If you have not done so, we request you immediately notify the insurer of the Tug of the casualty and request them to contact us directly.

Because these matters could require legal action, Carver is requested to place an immediate litigation hold on all potentially relevant documents and information, including electronically stored information (ESI). The failure to do so may expose Carver to sanctions or legal liability.

Mr. Nick Laraway
Chief Operating Officer, Carver Companies
June 20, 2024
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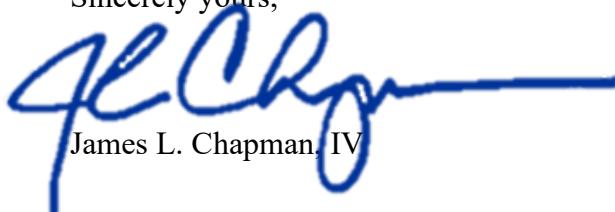
Carver must preserve and retain, and not discard, shred, or delete, any documents and information relating to the Tug and the casualty, including logbooks (rough and smooth), AIS data, notes, communications (text, email, voicemail and messaging services), photographs, video and other data. This includes, without limitation, all hard copy and electronic files, computer hard drives, mobile devices, backup media, home computers and personal laptops if used to perform work on behalf of Carver, and personal accounts for work-related communications.

Electronically stored information (ESI) will potentially be an important source of discovery or evidence. Carver must preserve all ESI related to the disputes and suspend the deletion, overwriting, or any other possible destruction of relevant electronic documents and data. Any automatic data destruction protocols must be suspended. Again, failure to do so could result in sanctions against Carver. These obligations apply to all relevant ESI, no matter when it was created. Carver has a continuing obligation to preserve all newly created ESI as well, not just ESI that was created before delivery of the contract termination and proposed debarment notices.

The legal obligation to preserve information also extends to any data, documents or information within Carver's "control." If Carver works with third-party vendors or other entities that may have data, documents or information covered by this demand, please notify us immediately so that we may determine whether to inform these third parties of their preservation obligations.

Please confirm receipt of this request and that Carver is undertaking to comply with it. Thank you for your prompt attention to this matter.

Sincerely yours,



A handwritten signature in blue ink, appearing to read "jlc/aj". Below the signature, the name "James L. Chapman, IV" is printed in a smaller, standard font.

JLC/ajc

Enclosure

cc: Brian Moore, GM, Carver Marine Towing - bmoore@carvercompanies.com
W. Ryan Snow, Esquire
Norfolk and Portsmouth Belt Line Railroad Company

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Chief Operating Officer, Carver Companies
June 20, 2024
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Enclosure

